

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re:	)	
	)	Chapter 11
THE PHILADELPHIA ORCHESTRA	)	11-13098(ELF)
ASSOCIATION	)	
	)	
Debtor.	)	
	)	

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Rules of Bankruptcy Procedure, and 11 U.S.C. §1102(1) and §1109(b), the undersigned attorneys appear for the Local 77, American Federation of Musicians, a creditor and party in interest in this proceeding, and request that all notice given or required to be given in this action and all related actions, be given and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers, whether formal or informal, *ex parte* or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading claim, or suit shall waive the above-named entities' right to have final orders in noncore matters entered only after *de novo* review by a District Judge; or the right to trial by jury in any proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: April 19, 2011  
Philadelphia, Pennsylvania

s/ Michael N. Katz, Esquire  
Michael N. Katz, Esquire  
Pennsylvania Bar No. 27857  
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*Attorneys for Local 77, American  
Federation of Musicians*

**CERTIFICATE OF SERVICE**

I, Michael N. Katz, hereby certify that a true and correct copy of the foregoing Entry of Appearance and Request for Notice was filed electronically and is available for viewing and downloading from the ECF system and was served this 19<sup>th</sup> day of April, 2011, by United States mail as follows:

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Counsel for Kimmel Center, Inc.

s/Michael N Katz  
Michael N. Katz

Dated: April 19, 2011